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March 8, 2025

Via ECF

Hon. Loretta A. Preska  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: USA v. Erdal Dere, 20 Cr. 501 (LAP)

Dear Judge Preska:

I represent Erdal Dere in the above referenced case. Mr. Dere seeks to expand his bail limits for the brief period from March 23 to March 29 to the US Virgin Islands over spring break for a family trip with his children. By memo endorsement dated May 12, 2021, Mr. Dere's geographic bail limits were extended to allow on notice short family related visits and sports related trips with his young children to other states by car as only permitted by Pre-Trial Services on 48 hours' notice to them and the government. Since that extension Mr. Dere has made other applications to travel in the United States by plane which applications have been granted. Pre-Trial Services and the government have no objection to this brief trip. Pre-Trial services will be advised of Mr. Dere's address. A passport is not needed to go to St. Thomas because it is US territory, but Mr. Dere has been advised to have his US passport on the return trip back to NYC because of enhanced security at the border even though Mr. Dere is a US citizen. Pre-Trial Service has no objection for Dere to have his passport back for the purpose of this trip, to avoid any incident or concern on his way back into NYC at Customs. Can this application also serve as an okay for the brief release of Dere's US passport which will be immediately returned to Pre-Trial Services. Accordingly, may this letter application be so ordered. Thank you very much.

SO ORDERED

*Loretta A. Preska*  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

*Elliot G. Sagor*

Elliot G. Sagor

Cc: AUSA Jessica Greenwood

3/10/25